

Steven P. Zurcher

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COMMISSION

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OFFICE OF GENERAL
COUNSEL

July 11th, 2011

Federal Election Commission
999 E Street, NW
Washington D.C. 20463

RE: MUR 6421

Dear Ms. Bauerly,

I am in receipt of the letter sent on your behalf, dated June 21st, 2011. My records and recollection of my personal activities on April 10th, 2010, do not seem to support the complainant's allegations and the charges as mentioned in the MUR: 6421 complaint.

I stand by my previous statement and belief that I am under no obligation to discuss my personal travel habits, outside those that are campaign related, with the FEC or the complainant, except when so compelled by the receipt of a subpoena. That being said, in the interest of cementing and clarifying my position on the matter, I have included a copy of the page from my personal pilot's log that includes the flight information and remarks for the date in question. The first remark, "Harbor Springs I.F.R." indicates the furthest point of the I.F.R. training flight. The second remark, "X entry IFR Flight" w/graphical downward pointing arrows, indicates that the flight was a cross country I.F.R. training flight encompassing all three entries. The third remark, "Bruce Rutter CFII..." is the instructor's signature and certification number.

As I previously stated, it is my recollection and my records support my recollection, that I flew an I.F.R. training flight on the date in question. I disagree that I made a corporate in-kind contribution to any campaign, as the flight was not a campaign flight, but an I.F.R. training flight as indicated and recorded in my pilot log. No money was spent on behalf of the Benishek or any other campaign, but rather paid to my flight instructor in the pursuit of an I.F.R. endorsement. Although the Benishek Campaign felt it necessary to send me a check to reimburse me for the flight, I disagreed with them on the nature of the flight and gave the entire amount to five local charities. They said

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they felt the payment would appease the complainant and deflect public scrutiny. I felt it was a non-conforming payment for a service that wasn't rendered. As I explained to the Benishek campaign, I felt it was highly appropriate, legal and healthy to share some quality personal time with Dr. Benishek, away from the demands of politics and campaigning. I hope the Commission understands and considers that candidates deserve some amount of time away from campaigning and the constant stress that they are under for such a long and arduous period.

In closing, I feel and still believe that personal (off the campaign clock) travel should not be a matter deserving of the complainants or FEC's attention, time and resources, not to mention legal authority. I value the Commission's diligence in pursuing matters that involve campaign financing, but I feel this matter does not belong in the campaign arena, and therefore, precludes the necessity for any party to expend any additional resources and time on the matter. I appreciate your understanding and look forward to a prompt dismissal of the complaint.

Sincerely,

Steven Zurcher

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